



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

December 2, 2024

**BY ECF**

The Honorable Jennifer L. Rochon  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

*Re:     The New York Times Company v. United States Department of State,  
No. 24 Civ. 8747 (JLR)*

Dear Judge Rochon:

This Office represents Defendant United States Department of State in the above-referenced case brought by Plaintiffs The New York Times Company and Julia Harris, pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. I write respectfully pursuant to Part 1.F of the Court’s Individual Rules of Practice to request an extension of time to file the joint letter required by the Court’s November 20, 2024, Order. Plaintiffs consent to this request.

On November 18, 2024, Plaintiffs filed the complaint in this action. *See* Dkt. No. 1. On November 20, 2024, the Court ordered the parties to submit a joint letter within two weeks—*i.e.*, by December 4, 2024—indicating whether there is a need for discovery or an initial conference in this case and, if not, proposing a briefing schedule for any motions, including motions for summary judgment. Dkt. No. 7. The complaint was served on this Office on November 22, 2024.

As this case arises under FOIA, the United States does not believe there is a need for discovery, and that it may be possible to avoid the need for an initial conference. However, the undersigned attorney was only recently assigned to the case and requires additional time to assess the allegations in the complaint and confer with agency counsel before the United States would be in a position to propose a briefing schedule for any motions. Accordingly, the United States respectfully requests an extension of two weeks—until December 18—to file the required letter. This is the United States’ first request for an extension of this deadline. Plaintiffs consent to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: s/ Rachael Doud  
RACHAEL DOUD  
Assistant United States Attorney  
86 Chambers St., 3rd Floor  
New York, New York 10007  
(212) 637-2699

cc: All counsel of record (via ECF)